

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

**SECOND AMENDED OBJECTIONS OF CREDITORS DEBORAH RYAN,  
WALTER SWIFT, CRISTOBAL MENDOZA AND ANNICA CUPPETELLI,  
INTERESTED PARTIES, TO THE FOURTH AMENDED PLAN FOR THE  
ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT AND  
CERTIFICATE OF SERVICE**

NOW COME DEBORAH RYAN, WALTER SWIFT, CRISTOBAL MENDOZA and ANNICA CUPPETELLI, interested parties and object to the “*Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (April 16, 2014)*.” [Dkt. #4392] In support of those objections, the aforementioned interested parties state the following:

1. On April 15, 2014, these Petitioners filed their Objections,[Dkt. #4099], to the earlier “Amended Plan” filed by the Debtor on March 31, 2014). [Dkt.#3380];
2. Thereafter on April 16, 2014, the Debtor filed yet another Amended Plan [Dkt. #4140], its Second Amended Plan, which continues to persist in this



Debtor's determination to ask this Court to provide relief that will violate the Fourteenth Amendment of the United States Constitution;

3. Again on April 23, 2014 these petitioners again objected in that this particular iteration of the parade of Amended Plans - Dkt. #4140 – was as objectionable as earlier versions and for the same reasons. Only the Paragraph numbers were changed so as to confuse the innocent.

4. Now, and yet again, this Debtor seeks to violate the Fourteenth Amendment of the Constitution of the United States in its Fourth Amended Plan [Dkt. #4392], filed on May 5, 2014. The previously objectionable paragraphs which would diminish, indeed virtually extinguish, the constitutional rights of these petitioners, appears in a form known as Paragraph #198.

5. Therefore, these Petitioners seek to make clear that the same Objections, previously filed as Docket #4099, apply with equal force to the Debtor's latest offering, its *Fourth Amended Plan of Adjustment*, Docket. #4392, in particular, Paragraph 198 thereof.

**WHEREFORE**, these Petitioners request the same relief sought in their earlier Objections [Dkt. #4099-1] and Brief In Support thereof [Dkt. #4099-2] (and reiterated in Dkt. # 4228), for precisely the same the reasons and authority cited therein, but as to the Fourth Amended Plan of Adjustment, Docket.#4392, in particular, Paragraph 198 thereof.

Respectfully submitted,

**GOODMAN & HURWITZ, P.C.**

By: /s/William H. Goodman

William H. Goodman P14173

1394 E. Jefferson Ave.

Detroit, MI 48207

313-567-6170

bgoodman@goodmanhurwitz.com

*Attorneys for Deborah Ryan, Walter Swift,*

*Cristobal Mendoza and Annica Cuppetelli*

Dated: **May 12, 2014**

**CERTIFICATE OF SERVICE**

I hereby certify that on **May 12, 2014**, I electronically filed *Amended Objections of Creditors Deborah Ryan, Walter Swift, Cristobal Mendoza and Annica Cuppetelli, Interested Parties, to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* with this *Certificate Of Service* attached, with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

**GOODMAN & HURWITZ, P.C.**

By: /s/William H. Goodman

William H. Goodman, P14173)

Counsel for Deborah Ryan, Walter Swift, Cristobal  
Mendoza and Annica Cuppetelli

1384 E. Jefferson Avenue

Detroit, MI 48207

Telephone: (313) 567-6170

Facsimile: (313) 567-4827

E-mail: [mail@goodmanhurwitz.com](mailto:mail@goodmanhurwitz.com); and  
[bgoodman@goodmanhurwitz.com](mailto:bgoodman@goodmanhurwitz.com)